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Attorneys for Defendant  
CITISTAFF SOLUTIONS, INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

DEMETRIC DI-AZ, OWEN DIAZ, and  
LAMAR PATTERSON,

Plaintiff,

vs.

TESLA, INC. dba TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES,  
INC.; and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF VERONICA  
MARTINEZ IN SUPPORT OF  
DEFENDANT CITISTAFF SOLUTIONS,  
INC.'S MOTION FOR SUMMARY  
JUDGMENT OR, IN THE  
ALTERNATIVE, MOTION FOR  
SUMMARY ADJUDICATION OF ISSUES**

Date: October 23, 2019  
Time: 2:00 p.m.  
Courtroom: 2, 17<sup>th</sup> Floor  
Judge: Hon. William H. Orrick

Trial Date: March 2, 2020  
Complaint filed: October 16, 2017

Gordon Rees Scully Mansukhani, LLP  
633 West Fifth Street, 52nd Floor  
Los Angeles, CA 90071

**DECLARATION OF VERONICA MARTINEZ**

I, Veronica Martinez, declare as follows:

1. I have personal knowledge of the matters contained in this declaration and if called to testify thereto, I would competently do so.

2. I am currently employed by Chartwell Staffing Services, Inc. ("Chartwell") as a Senior Area Vice President. I have worked for Chartwell in that capacity at all times relevant to this declaration.

3. Chartwell provides staffing and other human resources related services to small and large companies across the country, including Tesla.

4. On January 22, 2016, Chartwell was advised it had received a complaint via email from Owen Diaz alleging that Chartwell employee Ramon Martinez drew an offensive cartoon character on a cardboard box in the Tesla factory at which Diaz worked the complaint against Martinez.

5. Chartwell immediately began an investigation into the veracity of these allegations.

6. As part of the internal investigation, I interviewed Martinez on or about January 22, 2019.

7. Chartwell also conducted an interview of Diaz regarding the incident on Monday, January 25, 2016.

8. Chartwell then placed Martinez on Corrective Action from January 26, 2016, through December 31, 2016, for conduct substantially impairing the discipline and order of the work environment.

9. Chartwell does not have record of any harassment complaints filed against Martinez before, or after, this incident occurred. Chartwell does not have any record of any other harassment or discrimination complaint from that Tesla facility.

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1 I declare under penalty of perjury under the laws of the State of California that the  
2 foregoing is true and correct. Executed on this 4 day of June 2019 in \_\_\_\_\_,  
3 California.

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5 Veronica Martinez  
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